



United States
Department of
Agriculture

Food and
Nutrition
Service

Mountain
Plains
Region

1244 Speer Boulevard
Denver, CO 80204

SEP 21 1994

Reply to
Attn. of: SP 94-80

Subject: Coordinated Review Effort - New Guidance Pages 3-14a and 3-14b

To: STATE AGENCY DIRECTORS
(Child Nutrition Programs) - Colorado ED, Iowa, Kansas, Missouri ED,
Montana OPI, Nebraska ED, North Dakota,
South Dakota, Utah and Wyoming ED

Attached please find two pages of draft Guidance that outline the procedures proposed to be used to determine the reviewer's count of eligible students from the benefit issuance document(s). This Guidance was developed as a result of the collaboration meetings with the representative State Directors and is the last of the issues that we agreed to initiate.

Provide any comments you may have to this office by **October 7, 1994.**

If you have any questions, please call Jerry Stankorb at (303) 844-0355.

Gerald Stankorb
for ANN C. DEGROAT
Regional Director
Child Nutrition Programs

Attachments

REVIEWER'S COUNT OF ELIGIBLE STUDENTS FROM THE BENEFIT ISSUANCE DOCUMENT

GENERAL COMMENTS

The Reviewer's Count of Eligible Students recorded on S-1, block 13, is critical to the review process as these numbers are used to evaluate the accuracy and reliability of the meal count system as well as develop participation factors, if needed. Generally, the most accurate count of eligible students is obtained from the source documents, i.e., applications and direct certification documents.

These alternate procedures have been established for use in those cases where the reviewer determines that a more accurate count can be obtained by counting students by eligibility category from the benefit issuance document(s). For example, if the eligibility certification documents are not dated when students transfer/withdraw but the date of transfer/withdrawal is recorded on the benefit issuance document(s), the reviewer may determine that a more accurate count will be obtained from the benefit issuance document(s).

TYPES OF BENEFIT ISSUANCE DOCUMENTS

To be used to count students by eligibility category, the benefit issuance document(s) must include the name and eligibility category of all free and reduced price students eligible for the period selected for review. Benefit issuance documents that are incomplete or not specific to the time period being reviewed may not be used to obtain the count of eligible students.

In most cases, the benefit issuance document is either a meal count roster, a roster used to issue tickets, or a student specific ticket. In addition, a list of approved students that is maintained for each school may be used to obtain the count of eligible students.

While retention of tickets is not a regulatory requirement, many school food authorities retain tickets which would accommodate the use of this procedure. The school must have access to tickets for all eligible students including those who do not participate or participate infrequently. In addition, if a list of names is maintained for students who have lost/stolen tickets, new students who have not yet been issued a ticket, or a specific grade or classroom, the reviewer must obtain the list to use along with the tickets.

PROCEDURE Before the count of eligible students is made, determine if the benefit issuance document(s) accurately reflects the eligibility determinations made by the determining official. Compare 10 percent of the free and reduced price names on the benefit issuance document(s) to the eligibility certification document(s). If any student is listed in an eligibility category other than that assigned by the determining official on the

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eligibility certification document(s), 100 percent of the benefit issuance document(s) must be compared to the eligibility certification documents before the count of eligible students is made.

Adjustments must be made for all students listed on the benefit issuance document(s) in a category other than that indicated on the eligibility certification document or without an eligibility certification document. For example, if a student is listed as free but the application was approved for reduced price benefits, the benefit issuance document must be adjusted prior to the Reviewer's Count of Eligible Students. If a student is listed, but there is no document to support eligibility, the student cannot be counted as a free or reduced price eligible.

In addition, the reviewer should be cognizant of a student's name being duplicated in different locations on a roster or on duplicate tickets and must make adjustments accordingly.

**COUNTING
FROM THE
BENEFIT
ISSUANCE
DOCUMENT**

To determine the Reviewer's Count of Eligible Students to record on School Data, S-1, block 13, count the number of eligible students listed on the adjusted benefit issuance document(s). Include all free and reduced price students listed on the benefit issuance document(s) who were enrolled or attended the school at any time during the time period being reviewed.

When the SFA/school has approved a student for benefits and the household has requested a lower benefit level, count the student in the category requested by the household.

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